

January 27, 2017

Azusa Land Reclamation Incorporated	CT Corporation System
Attn: Scott Tianac	Agent for Service of Process
Facility Owner	Azusa Land Reclamation, Inc.
1211 W. Gladstone St.	818 West Seventh St., Ste. 930
Azusa, CA 91702	Los Angeles, CA 90017
Gina McCarthy	Samuel Unger, Executive Officer
Administrator	Regional Water Quality Control Board
U.S. Environmental Protection Agency	Los Angeles Region
Mail Code: 110 IA	320 West Fourth St., Ste. 200
1200 Pennsylvania Avenue, N.W.	Los Angeles, CA 90013
Jared Blumenfeld	Thomas Howard
Regional Administrator	Executive Director
U.S. EPA, Region 9	State Water Resources Control Board
75 Hawthorne Street	1001 I Street
San Francisco, CA 94105	Sacramento, CA 95814

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

# To Whom It May Concern:

Levitt Law, APC ("Levitt Law") represents Our Clean Waters ("OCW"), a non-profit corporation organized under the laws of the State of California. This letter is to give notice that Levitt Law, on behalf of OCW, intends to file a civil action against Azusa Land Reclamation, Inc. ("Azusa") for violations of the Federal Water Pollution Control Act, 33 U.S.C. § 1251 et seq. ("Clean Water Act" or "CWA") at Azusa's Facility located at 1211 W. Gladstone St., Azusa, CA 91702 (the "Facility").

OCW is concerned with the environmental health of the San Gabriel River, surrounding lakes and streams, the Los Angeles coastline, and the Pacific Ocean, on behalf of the public that uses and enjoys said water bodies, its inflows, outflows, and other waters of the Affected Watershed. The public's use and enjoyment of these waters is negatively affected by the pollution caused by Azusa's operations. Additionally, OCW acts in the interest of the general public to prevent pollution in these waterways, for the benefit of their ecosystems, and for the benefits of all individuals and communities who use these waterways for various recreational, educational, and spiritual purposes.

This letter addresses Azusa's unlawful discharge of pollutants from the Facility via an indirect method into the San Gabriel River, then Los Angeles' waterways, and eventually into the Pacific Ocean. Specifically, investigation of the Facility has uncovered significant, ongoing, and continuous violations of the CWA and the National Pollutant Discharge Elimination System ("NPDES") Industrial General Permit No CASOOOO1 (State Water Resources Control Board)

Water Quality Orders No. 2014-0057-DWQ ("Industrial General Permit") and 92-12-DWQ (as amended by Order No. 97-03-DWQ) ("Previous Industrial General Permit").

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), notice must be given to file suit. 33 U.S.C. §1365(b). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA"), and the State in which the violations occur. As required by section 505(b), this Notice of Violation and Intent to File Suit provides notice to Azusa of the violations that have occurred and which continue to occur at the Facility. OCW does not believe that no water is discharged from the site, as Azusa alleges in its SMARTS reporting. After the expiration of sixty (60) days from the date of this Notice of Violation and the Intent to File Suit, OCW intends to file suit in federal court against Azusa under CWA section 505(a) for the violations described more fully below.

During the 60-day notice period, OCW is willing to discuss effective remedies for the violations noticed in this letter. We suggest that Azusa contact OCW's attorneys at Levitt Law within the next twenty (20) days so these discussions may be completed by the conclusion of the 60-day notice period. Please note that we do not intend to delay the filing of a complaint in federal court, and service of the complaint shortly thereafter, even if discussions are continuing when the notice period ends. Implementation of curative measures and the absolute stopping of all violations would have to occur to delay such court filing.

### I. THE LOCATION OF THE ALLEGED VIOLATIONS

# A. The Facility

Azusa's Facility is located at 1211 Gladstone, Azusa, CA 91702 and does business with the Facility name of "Azusa Land Reclamation, Inc." At the Facility, Azusa operates as a waste disposal company. The standard industrial classification code that applies to the Facility is 4953. Azusa utilizes the following industrial materials at the Facility: diesel fuel, gasoline, lubricants, transmission fluid, antifreeze, originating from the trucking and transportation of the waste it handles. Azusa's disposal site has an innumerable amount of polluting materials that become hazardous to the ecosystem following storm event discharges. Azusa also conducts the following industrial activities at the Facility: operation of dumps; collection and processing of garbage; operation of a landfill; collection and disposal of rubbish, and the like.

The trucking operations carried out at the Facility includes, but is not limited to, debris removal, garbage collection and transportation, refuse collection and transportation, and fuel storage. Possible pollutants from the Facility include pH, Total Suspended Solids ("TSS"), Oil and Grease ("O&G"), Aluminum ("Al"), Iron ("Fe"), Lead ("Pb"), Zinc ("Zn") and other pollutants. Stormwater from the Facility discharges, via the local storm sewer system and/or surface runoff indirectly into the Little Dalton Wash where it eventually meets the Los Angeles coastline.

## B. The Affected Water

The pollutants are received by the Little Dalton Wash, the San Gabriel River, and then finally enter into Pacific Ocean. The CWA requires that water bodies such as the Little Dalton Wash,

On April 1, 2014, the State Water Resources Control Board adopted an updated NPDES General Permit for Discharges Associated with Industrial Activity, Water Quality Order No. 2014-57-DWQ, which has taken force or effect on its effective date of July 1, 2015. As of the effective date, Water Quality Order No. 2014-57-DWQ has superseded and rescinded the prior Industrial General Permit except for purposes of enforcement actions brought pursuant to the prior permit.

the San Gabriel River, and the Pacific Ocean meet water quality objectives that protect specific "beneficial uses." For example, the beneficial uses of the San Gabriel River Watershed include contact and noncontact water recreation, protection of endangered species, spawning, marine habitat, estuarine habitat, commercial and sport fishing, municipal water supply, etc. Contaminated stormwater from the Facility adversely affects the water quality of the Little Dalton Wash, San Gabriel River, Pacific Ocean and the overall Affected Watershed, and threatens the beneficial uses and ecosystems of these waters, which includes habitats for threatened or endangered species.

# II. THE FACILITY'S VIOLATIONS OF THE CLEAN WATER ACT

It is unlawful to discharge pollutants to waters of the United States, such as the Little Dalton Wash, the San Gabriel River, and the Pacific Ocean without an NPDES permit or in violation of the terms and conditions of an NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); see also CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Industrial General Permit authorizes certain discharges of stormwater, conditioned on compliance with its terms.

Azusa has submitted a Notice of Intent ("NOI") to be authorized to discharge stormwater from the Facility under the Industrial General Permit since at least 2011. However, information available to OCW indicates that stormwater discharges from the Facility have violated several terms of the Industrial General Permit and the CWA. Apart from discharges that comply with the Industrial General Permit, the Facility lacks NPDES permit authorization for any other discharges of pollutants into waters of the United States. OCW is also concerned about the accuracy of Azusa's claim that its 302-acre site had zero discharges for every rain event that occurred in the latter half of 2015 and throughout 2016.

# A. Discharges in Excess of BAT/BCT Levels

The Effluent Limitations of the Industrial General Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable ("BAT") for toxic pollutant<sup>2</sup> and best conventional pollutant control technology ("BCT") for conventional pollutants.<sup>3</sup> Industrial General Permit, Section I (D) (32), II (D) (2); Previous Industrial General Permit Order, Part B (3). The EPA has published Numeric Action Level (NAL) values in the current Industrial General Permit (also known as Benchmark values in the Previous Industrial General Permit) set at the maximum pollutant concentration present if an industrial Facility is employing BAT and BCT, listed in Attachment 1 to this letter. Additionally, the Previous Industrial General Permit notes that effluent limitation guidelines for several named industrial categories have been established and codified by the Federal Government. See Previous Industrial General Permit, Section VIII. The Previous Industrial General Permit mandates that for facilities that fall within such industrial categories, compliance with the listed BAT and BCT for the specified pollutant parameters listed therein must be met in order to be in compliance with the Previous Industrial General Permit. Id. Azusa falls within these named industrial categories and it must have complied with the effluent limitations found therein in order to have been in compliance with the Previous Industrial General Permit during its effective period. Based on Azusa's self-reporting

BAT is defined at 40 CF.R. § 437.1 et seq. Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

BCT is defined at 40 CF.R. § 437.1 et seq. Conventional pollutants are listed at 40 C.F.R. § 401.16 and include BOD, TSS, O&G, and pH.

<sup>&</sup>lt;sup>4</sup> The Benchmark values are part of the EPAs Multi-Sector General Permit ("MSGP). See 73 Fed. Reg. 56,572 (Sept. 29, 2008) (Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities).

data and/or lack thereof, Azusa has not met this requirement and was in violation of the Previous Stormwater Permit over a period of at least five (5) years. The current Industrial General Permit NAL Values are listed in Attachment 2 to this letter.

Azusa's self-reporting of industrial stormwater discharges shows a pattern of exceedances of Benchmarks and NAL values, especially as it pertains to the parameters of Iron, Total Suspended Solids, and Specific Conductance. See Attachment 3. This pattern of exceedances of Benchmarks and NAL values indicate that Azusa has failed and is failing to employ measures that constitute BAT and BCT in violation of the requirements of the Industrial General Permit and Previous Industrial General Permit. OCW alleges and notifies Azusa that its stormwater discharges from the Facility have consistently contained and continue to contain levels of pollutants that exceed Benchmark Values for Iron, Total Suspended Solids, and Specific Conductance. Azusa's ongoing discharges of storm water containing levels of pollutants above EPA Benchmark values, and BAT and BCT based levels of control, also demonstrate that Azusa has not developed and implemented sufficient Best Management Practices ("BMPs") at the Facility. Proper BMPs could include, but are not limited to, moving certain pollution-generating activities under cover or indoors, capturing and effectively filtering or otherwise treating all stormwater prior to discharge, frequent sweeping to reduce build-up of pollutants on-site, installing filters on downspouts and storm drains, and other similar measures.

Azusa's failure to develop and/or implement adequate pollution controls to meet BAT and BCT at the Facility violates and will continue to violate the CWA and the Industrial General Permit each and every day Azusa discharges stormwater without meeting BAT/BCT. OCW alleges that Azusa has discharged stormwater containing excessive levels of pollutants from the Facility to the Little Dalton Wash and into the San Gabriel River, eventually leading to the Pacific Ocean during significant local rain events over 0.2 inches in the last five (5) years. Every significant rain event that has occurred in the last five (5) years represents a discharge of polluted stormwater run-off into the Little Dalton Wash, the San Gabriel River, and then into the Pacific Ocean. Azusa is subject to civil penalties for each violation of the Industrial General Permit and the CWA within the past five (5) years.

#### **B. Discharges Impairing Receiving Waters**

The Industrial General Permit's Discharge Prohibitions disallow stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance. See Industrial General Permit, Section III; Previous Industrial General Permit Order, Part A (2). The Industrial General Permit also prohibits stormwater discharges to surface or groundwater that adversely impact human health or the environment. See Industrial General Permit, Section VI (b-c); Previous Industrial General Permit Order, Part C (1). Receiving Water Limitations of the Industrial General Permit prohibit stormwater discharges that cause or contribute to an exceedance of applicable Water Quality Standards ("WQS") contained in a Statewide Water Quality Control Plan or the applicable Regional Water Board's Basin Plan. See Industrial General Permit, Section VI (a); Previous Industrial General Permit Order, Part C (2). Applicable WQS are set forth in the California Toxic Rule ("CTR")<sup>5</sup> and Chapter 3 of the Los Angeles Region (Region 4) Water Quality Control Plan (the "Basin Plan"). Exceedances of WQS are violations of the Industrial General Permit, the CTR, and the Basin Plan.

<sup>5</sup> The CTR is set forth at 40 CF.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31, 682 (May 18, 2000).

<sup>6</sup> The Basin Plan is published by the Los Angeles Regional Water Quality Control Board and can be accessed at http:///www.waterboards.ca.gov.

The Basin Plan establishes WQS for all Inland Surface Waters, including the Affected Water Body Watershed, which contain, but are not limited, to the following:

- Waters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial users.
- Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in natural turbidity attributable to controllable water quality factors shall not exceed 20% where natural turbidity is between 0 and 50 cephalometric turbidity units ("NTU"), and shall not exceed 10% where the natural turbidity is greater than 50 NTU.
- All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant, animal, or aquatic life.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.

OCW alleges that Azusa's stormwater discharges have caused or contributed to exceedances of Receiving Water Limitations in the Industrial General Permit and the WQS set forth in the Basin Plan and CTR. These allegations are based on Azusa's self-reported data submitted to the Los Angeles Regional Water Quality Control Board. These sampling results indicate that Azusa's discharges are causing or threatening to cause pollution, contamination, and/or nuisance; adversely impacting human health or the environment; and violating applicable WQS. For example, Azusa's sampling results indicate exceedances of WQS for Iron, TSS and Specific Conductance, as listed in Attachment 3.

OCW alleges that each day that Azusa has discharged stormwater from the Facility, Azusa's stormwater has contained levels of pollutants that exceeded one or more of the Receiving Water Limitations and/or applicable WQS in Little Dalton Wash and the Affected Watershed. OCW alleges that Azusa has discharged stormwater exceeding Receiving Water Limitations and/or WQS from the Facility to the Little Dalton Wash, the San Gabriel River, the Pacific Ocean, and the Affected Watershed during significant local rain events over 0.2 inches in the last five (5) years. Each discharge from the Facility that violates a Receiving Water Limitation or has caused or contributed, or causes or contributes, to an exceedance of an applicable WQS constitutes a separate violation of the Industrial General Permit and the CWA. Azusa is subject to penalties for each violation of the Industrial General Permit and the CWA within the past five (5) years.

C. Failure to Develop and Implement an Adequate Stormwater Pollution Prevention Plan
The Industrial General Permit requires dischargers to develop and implement an adequate
Storm Water Pollution Prevention Plan ("SWPPP"). See Industrial General Permit, Section X
(B); Previous Industrial General Permit, Part A (I) (a). The Industrial General Permit also
requires dischargers to make all necessary revisions to the existing SWPPP promptly. See
Industrial General Permit, Section X (B); Previous Industrial General Permit Order, Part E (2).
The SWPPP must include, among other requirements, the following: a site map, a list of
significant materials handled and stored at the site, a description and assessment of all Azusa
pollutant sources, a description of the BMPs that will reduce or prevent pollutants in stormwater
discharges, specification of BMPs designed to reduce pollutant discharge to BAT and BCT
levels, a comprehensive site compliance evaluation completed each reporting year, and revisions
to the SWPPP within 90 days after a Facility manager determines that the SWPPP is in violation

of any requirements of the Industrial General Permit. See Industrial General Permit, Section X (A); Previous Industrial General Permit, Part A.

Based on information available to OCW, Azusa has failed to prepare and/or implement an adequate SWPPP and/or failed to revise the SWPPP to satisfy each of the requirements stated in Section X (A) of the Industrial General Permit and/or the corresponding Section of the Previous Industrial General Permit. For Example, Azusa's SWPPP does not include and/or Azusa has not implemented adequate BMPs designed to reduce pollutant levels in discharges to BAT and BCT levels in accordance with Section A (8) of the Industrial General Permit as evidenced by the data in Attachment 3. Accordingly, Azusa has violated the CWA each and every day that it has failed to develop and/or implement an adequate SWPPP meeting all of the requirements of Section X (A) of the Industrial General Permit and/or the corresponding Section of the Previous Industrial General Permit, and Azusa will continue to be in violation every day until it develops and implements an adequate SWPPP. Azusa is subject to penalties for each violation of the Industrial General Permit and the CWA occurring within the past five (5) years.

# D. Failure to Develop and Implement an Adequate Monitoring and Reporting Program and to Perform Annual Comprehensive Site Compliance Evaluations

The Industrial Stormwater Permit requires Facility operators to develop and implement a Monitoring Implementation Program ("MIP"). See Industrial General Permit, Section XI; Previous Industrial General Permit, Section B (I) and Order, Part E (3). The Industrial General Permit requires that the MIP ensure that the Facility's stormwater discharges comply with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the Industrial General Permit. *Id.* Facility operators must ensure that their MIP practices reduce or prevent pollutants in stormwater and authorized non-stormwater discharges as well as evaluate and revise their practices to meet changing conditions at the Facility. *Id.* This may include revising the SWPPP as required by Section X (A) of the Industrial General Permit and/or the corresponding Section of the Previous Industrial General Permit.

The MIP must measure the effectiveness of BMPs used to prevent or reduce pollutants in stormwater and authorized non-stormwater discharges, and Facility operators must revise the MIP whenever appropriate. See Industrial General Permit, Section XI; Previous Industrial General Permit, Section B. The Industrial General Permit requires Facility operators to visually observe and collect samples of stormwater discharges from all drainage areas. *Id.* Facility operators are also required to provide an explanation of monitoring methods describing how the Facility's monitoring program will satisfy these objectives. *Id.* 

Azusa has been operating the Facility with an inadequately developed and/or inadequately implemented MIP, in violation of the substantive and procedural requirements set forth in Section B of the Industrial General Permit. For example, the data in Attachment 3 indicates that Azusa's monitoring program has not ensured that stormwater discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations of the Industrial General Permit as required by the Industrial General Permit, Section XI and/or the Previous Industrial General Permit, Section B. The monitoring has not resulted in practices at the Facility that adequately reduce or prevent pollutants in stormwater as required by the Industrial General Permit, Section XI and/or the Previous Industrial General Permit, Section B. Similarly, the data in Attachment 3 indicates that Azusa's monitoring program has not effectively identified or responded to compliance problems at the Facility or resulted in effective revision of the BMPs

in use or the Facility's SWPPP to address such ongoing problems as required by Industrial General Permit, Section XI and/or the Previous Industrial General Permit, Section B.

As a result of Azusa's failure to adequately develop and/or implement an adequate MIP at the Facility, Azusa has been in daily and continuous violation of the Industrial Stormwater Permit and the CWA each and every day for the past five (5) years. These violations are ongoing. Azusa will continue to be in violation of the monitoring and reporting requirement each day that Azusa fails to adequately develop and/or implement an effective MIP at the Facility. Azusa is subject to penalties for each violation of the Industrial General Permit and the CWA occurring for the last five (5) years.

# E. Unpermitted Discharges

Section 301(a) of the CWA prohibits the discharge of any pollutant into waters of the United States unless the discharge is authorized by an NPDES Permit issued pursuant to Section 402 of the CWA. See 33 U.S.C. § 1311 (a), 1342. Azusa sought coverage for the Facility under the Industrial General Permit, which states that any discharge from an industrial Facility not in compliance with the Industrial General Permit must be either eliminated or permitted by a separate NPDES permit. Industrial General Permit, Section III; Previous Industrial General Permit Order, Part A (1). Because Azusa has not obtained coverage under a separate NPDES permit and has failed to eliminate discharges not permitted by the Industrial General Permit, each and every discharge from the Facility described herein, not in compliance with the Industrial General Permit, has constituted and will continue to constitute a discharge without CWA Permit coverage in violation of section 301 (a) of the CWA, 33 U.S.C. § 131 I(a).

### III. PERSON RESPONSIBLE FOR THE VIOLATIONS

Azusa Land Reclamation, Inc. is responsible of the violations at the Facility located at 1211 Gladstone, Azusa, CA 91702 and described above.

#### IV. NAME AND ADDRESS OF NOTICING PARTY

**OUR CLEAN WATERS** Laura Meldere, Executive Director 9465 Wilshire Blvd., Suite 300 Beverly Hills, CA 90212 Phone: 424-284-4085

Email: info@ourcleanwaters.com

#### V. LEGAL COUNSEL

Levitt Law, APC Scott L. Levitt, Esq. scott@levittlawca.com 311 Main Street, Suite #8 Seal Beach, CA 90740 T: (562) 493-7548 F: (562) 493-7562

#### VI. REMEDIES

As stated previously, OCW intends, at the close of the 60-day notice period or thereafter, to file suit under CWA section 505(a) against Azusa for the above-referenced violations. OCW will seek declaratory and injunctive relief to prevent further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C.§ 1365(a) and (d), and such other relief as permitted by law. In addition, OCW will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C.§ 1319(d), and 40 C.F.R.§ 19.4, against Azusa in this action. The CWA imposes civil penalty liability of up to \$37,500 per day, per violation for violations occurring after January 12, 2009, plus attorneys' fees and costs (33 U.S.C.§ 1319(d); 40 C.F.R.§ 19.4). Just going back a period of three years, with your seven days per week operations would amount to a sum no less than \$41,062,500.00. OCW will seek to recover such penalties, restitution, attorneys' fees, experts' fees, and costs in accordance with CWA section 505(d), 33 U.S.C.§ 1365(d).

As noted above, OCW and its Counsel are willing to meet with you during the 60-day notice period to discuss effective remedies for the violations noted in this letter. Please contact me to initiate these discussions.

Sincerely,

Scott L. Levitt, Esq.

# ATTACHMENT 1: U.S. EPA Benchmarks of Acceptable Levels

Parameter Name		enchmark: table Range
рН	6 to 9	
Total Suspended Solids	Below	100 mg/L
Specific Conductance	Below	200 umhos/cm
TOC	Below	100mg/L
Aluminum	Below	0.75 mg/L
Zinc	Below	.117 mg/L
Iron	Below	1.0 mg/L
Copper	Below	0.0636 mg/L
Lead	Below	0.0816 mg/L
COD	Below	120 mg/L
Nitrogen Ammonia	Below	19 mg/L
Nitrate + Nitrite Total	Below	.68 mg/L
BOD	Below	30 mg/L

Industrial General Permit Order

TABLE 2: Parameter NAL Values, Test Methods, and Reporting Units

PARAMETER	TEST METHOD	REPOR TING UNITS	ANNUAL NAL	INSTANTA NEOUS MAXIMUM NAL
pH*	See Section XI.C.2	pH units	N/A	Less than 6.0 Greater than 9.0
Suspended Solids (TSS)*, Total	SM 2540-D	mg/L	100	400
Oil & Grease (O&G)*, Total	EPA 1664A	mg/L	15	25
Zinc, Total (H)	EPA 200.8	mg/L	0.26**	
Copper, Total (H)	EPA 200.8	mg/L	0.0332**	
Cyanide, Total	SM 4500-CN C, D, or E	mg/L	0.022	
Lead, Total (H)	EPA 200.8	mg/L	0.262**	
Chemical Oxygen Demand (COD)	SM 5220C	mg/L	120	
Aluminum, Total	EPA 200.8	mg/L	0.75	1
Iron, Total	EPA 200.7	mg/L	1.0	1
Nitrate + Nitrite Nitrogen	SM 4500-NO3- E	mg/L as N	0.68	
Total Phosphorus	SM 4500-P B+E	mg/L as	2.0	
Ammonia (as N)	SM 4500-NH3 B+ C or E	mg/L	2.14	1.5
Magnesium, total	EPA 200.7	mg/L	0.064	4.77
Arsenic, Total (c)	EPA 200.8	mg/L	0.15	
Cadmium, Total (H)	EPA 200.8	mg/L	0.0053**	
Nickel, Total (H)	EPA 200.8	mg/l	1.02**	-
Mercury, Total	EPA 245.1	mg/L	0.0014	1
Selenium, Total	EPA 200.8	mg/L	0.005	
Silver, Total (H)	EPA 200.8	mg/L	0.0183**	
Biochemical Oxygen Demand (BOD)	SM 5210B	mg/L	30	

SM - Standard Methods for the Examination of Water and Wastewater, 18th edition

EPA - U.S. EPA test methods

(H) - Hardness dependent

<sup>\*</sup> Minimum parameters required by this General Permit

<sup>\*\*</sup>The NAL is the highest value used by U.S. EPA based on their hardness table in the 2008 MSGP.

# ATTACHMENT 3: Table of Exceedances for Azusa (Page 1 of 2)

Date	Paramete	ers Tested	
10/5/2011	Iron	2.5	_
		AVG: 2.5 mg/L	
12/12/2011	Iron	4.4	
		AVG: 4.4 mg/L	
2/6/2014 Iron	1.3		
		AVG: 1.3 mg/L	
	Specific Conductance	810	
		AVG: 810 umhos/cm	
12/2/14	Iron	1.9	
		AVG: 1.9 mg/L	
	<b>Total Suspended Solids</b>	190 mg/L	
		AVG: 190 mg/L	
5/14/2015 Iron Specific C	Iron	59	
		AVG: 59 mg/L	
	Specific Conductance	340	
		AVG: 340 umhos/cm	

ANNUAL NAL OF PARAMETERS			
Iron	1.0		
<b>Total Suspended Solids</b>	Below 100mg/L		
Specific Conductance	Below 200 umhos/cm		





